

parties and witnesses and in the interest of justice. Such is the case here, as there is no connection between any of the facts of this matter and the Beaumont Division.

III. ARGUMENT AND AUTHORITIES

A. Proper Venue in the Tyler Division

The Tyler Division is a proper venue for this action as all relevant events occurred there, and all parties and witnesses reside or are located within that division. Beaumont is inappropriate, as it has no connection to the facts underlying this lawsuit, and was, as mentioned above, only filed in Beaumont due to an inadvertent error made in the filing process.

B. Convenience of Parties and Witnesses

Transferring the case to the Tyler Division would significantly reduce travel time and expenses for all parties and witnesses, thereby serving the convenience of the parties and witnesses, especially because no witnesses, evidence or parties are located in Beaumont.

C. Interest of Justice

Given that the case has no connection to the Beaumont Division, transferring it to the Tyler Division would promote judicial efficiency and serve the interest of justice.

IV. CONCLUSION AND PRAYER

For the foregoing reasons, Plaintiff respectfully requests that the Court transfer this case to the Tyler Division of the Eastern District of Texas.

Respectfully submitted,

WELMAKER LAW, PLLC

/s/ Douglas B. Welmaker

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion to Transfer Venue has been filed electronically through the CM/ECF system on May 8, 2025.

/s/ Douglas B. Welmaker

Douglas B. Welmaker